

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRANCESCA GINO,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE, SRIKANT
DATAR, URI SIMONSOHN, LEIF
NELSON, JOSEPH SIMMONS, JOHN
DOES 1-10, AND JANE DOES 1-10,

Defendants.

Civil Action No. 1:23-cv-11775-MJJ

STIPULATION AND [PROPOSED] ORDER REGARDING CASE SCHEDULE

Plaintiff Francesca Gino (“Plaintiff”) and Defendants President and Fellows of Harvard College and Srikant Datar (“Harvard” and, together with Plaintiff the “Parties”), by and through their undersigned counsel, respectfully jointly move the Court to enter this Stipulation and [Proposed] Order Regarding Case Schedule (the “Stipulation”). In support, the Parties state as follows:

1. On September 18, 2024, Plaintiff and Defendants jointly filed a Stipulation and Proposed Order Regarding Case Schedule, in which they stipulated, subject to this Court’s approval, to the following:
 - a. Plaintiff would file an Assented-To Motion for Leave to File a Second Amended Complaint, incorporating her claims against Defendants under Title VII and Chapter 151B on or before October 18, 2024; and
 - b. The Harvard Defendants’ deadline to file a responsive pleading to such Second Amended Complaint would be November 8, 2024.

- c. The Initial Case Management Conference currently set for October 23, 2024, and all associated deadlines would be continued to a date of the Court's convenience after November 8, 2024.

(Doc. No. 77).

2. Pursuant to this Court's September 19, 2024 Electronic Order, the Court adopted the deadlines set forth in the Joint Stipulation and Proposed Order Regarding Case Schedule.

3. Additional time is required by Plaintiff's counsel due to other scheduling and deadline conflicts.

4. On October 18, 2024, counsel for the Parties communicated via electronic email regarding Plaintiff's desire for an extension of the deadlines set forth in the Court's Order, to which Defendants assented on the condition that the deadline for Defendants' responsive pleading be similarly extended as provided below.

5. The Parties have agreed, subject to the Court's approval, the following:
 - a. Plaintiff's Deadline to file an Assented-To Motion for Leave to File a Second Amended Complaint, incorporating her claims against Defendants under Title VII and Chapter 151B, shall be October 21, 2024; and
 - b. The Harvard Defendants' deadline to file a responsive pleading to such Second Amended Complaint shall be November 12, 2024.

Dated: October 18, 2024

Respectfully submitted,

/s/ Julie A. Sacks

Andrew T. Miltenberg, Esq.

(*pro hac vice* forthcoming)

Kara L. Gorycki, Esq.

(*pro hac vice* forthcoming)

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*Counsel for Defendants President and
Fellows of Harvard College and Srikant
Datar*

SO ORDERED

Dated: _____

Hon. Myong J. Joun

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2024, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: October 18, 2024

/s/ Julie A. Sacks

Julie A. Sacks